UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DFINITY FOUNDATION,)	
)	
Plaintiff,)	Case No. 1:22-cv-05418-LAK
)	
v.)	**ORAL ARGUMENT REQUESTED**
)	
THE NEW YORK TIMES COMPANY, *et al*.,)	
)	
Defendants.)	
)	

THE ARKHAM DEFENDANTS'
NOTICE OF MOTION TO DISMISS THE COMPLAINT

PLEASE TAKE NOTICE that Defendants Arkham Intelligence, Inc., Miguel Morel, and Zachary Lerangis (collectively, the "Arkham Defendants") by their undersigned counsel, hereby move this Honorable Court for an Order, Pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing with prejudice Plaintiff's Complaint in its entirety and for such other relief as the Court deems just and proper. Defendants will rely upon the Memorandum of Law in Support of the Arkham Defendants' Motion to Dismiss the Complaint and the Declaration of Meghan K. Spillane in Support of the Arkham Defendants' Motion to Dismiss the Complaint, with accompanying exhibits, submitted herewith, as well as any further argument and briefing as may be presented. The Arkham Defendants respectfully request that oral argument on this motion be held on a date and at a time designated by the Court.

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Dated: September 16, 2022   Respectfully Submitted,

/s/ Meghan K. Spillane
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CERTIFICATE OF SERVICE

I, Meghan K. Spillane, hereby certify that on September 16, 2022, a true and correct copy of the foregoing was electronically filed and served on all parties of record via the Court's CM/ECF system.

Dated: September 16, 2022   */s/ Meghan K. Spillane*